

**Texas Commission on Environmental Quality**  
**Investigation Report**  
**METAL PLATING SYSTEMS**  
**CN600255392**

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**HIGH TECH PLATING**

**RN100700939**

**Investigation #** 566299

**Incident #**

**Investigator:** DEANA HETHERINGTON

**Site Classification**

SMALL QUANTITY GENERATOR

**Conducted:** 06/14/2007 -- 06/14/2007

**SIC Code:** 9999

**Program(s):** INDUSTRIAL AND HAZARDOUS WASTE GENERATION  
INDUSTRIAL AND HAZARDOUS WASTE TRANSPORTATION

**Investigation Type :** Compliance Investigation

**Location :** 2017 Peachtree Rd, Balch  
Springs, TX

**Additional ID(s) :** 39292  
TXD174127407

**Address:** 2017 S PEACHTREE  
RD; BALCH SPRINGS, TX 75180

**Activity Type:** REGION 04 - DFW METROPLEX  
IHCSE - On-site follow-up investigation

**Principal(s) :**

Role	Name
RESPONDENT	METAL PLATING SYSTEMS

**Contact(s) :**

Role	Title	Name	Phone
Regulated Entity Contact	OWNER	MR REGINALD GIST	

**Other Staff Member(s) :**

Role	Name
QA Reviewer	JIM KERLIN
Supervisor	JIM KERLIN
Investigator	PAULA SEN

**Associated Check List**

**Checklist Name**

**Unit Name**

**Investigation Comments :**

**INTRODUCTION**

On 06/14/07, Ms. Deana Hetherington, Environmental Investigator, accompanied by Ms. Paula Sen, Environmental Investigator, the team, conducted an agreed order on-site follow-up investigation concerning industrial hazardous waste issues. At the time of the investigation, the team observed that High Tech Plating (HTP) was no longer in operation at this site.

This investigation was conducted in response to a request from the Texas Commission on Environmental Quality (TCEQ) Enforcement Division to the TCEQ DFW Regional office for an assessment of compliance with the Agreed Order Docket No. 95-1134-IHW-E in the matter of Mr. Reginald Gist and HTP, located at 2017 Peachtree, Balch Springs, Dallas County.

**GENERAL FACILITY AND PROCESS INFORMATION**

HTP facility operated an electro-plating process on miscellaneous parts with zinc and chrome.

**BACKGROUND**

An Agreed Order with Docket No. 95-1134-IHW-E dated 09/06/95 was issued by the TNRCC to Mr. Gist and HTP with Solid Waste No. 39292.

**SUMMARY OF INVESTIGATION/ADDITIONAL INFORMATION**

This investigation was conducted by the team, on 06/14/07 at about 1:30 PM. The team surveyed the building located at 2017 Peachtree, Balch Springs, Texas. The team spoke with Mr. Tom Lorenz, Owner of Smiley's Racing Products, and current owner of this building. He stated that he purchased the property from Cavendar Boots in 1994 and was told that a cleanup was done by EPA previous to Cavendar Boots purchase of the site. During this site investigation the team did not see any obvious discharge of unauthorized materials to surface soils and did not see any obvious damage to vegetation surrounding the building located at 2017 Peachtree, Balch Springs, Texas. HTP is no longer in operation at this site and has not been for more than 15 years.

The writer spoke with Ms. Xiaohong Wang, TCEQ Superfund Site Investigator, on 07/16/07. Ms. Wang gave the writer a copy of the State Superfund Candidate Site Eligibility / Status Sheet that states MPS is an inactive facility and currently under TCEQ enforcement (See Attachment 1). This document states that the Environmental Protection Agency (EPA) Emergency Response Branch responded to an anonymous complaint on 02/28/90, which led to a site assessment conducted on 03/01/90. The clean-up process for this site was conducted by the EPA in March through June of 1990.

The writer contacted the TCEQ Enforcement Coordinator, Ms. Rebecca Boyett, on 10/12/07 and informed her of the investigation date and findings.

**CONCLUSIONS**

Mr. Gist did not respond or comply with Agreed Order Docket No. 95-1134-IHW-E in reference to HTP. The facility is no longer in operation and the current property owner has changed to Mr. Lorenz as of 1994. No obvious discharge of unauthorized materials to surface soils and no obvious damage to vegetation surrounding HTP were noted during the investigation conducted on 06/14/07. This information was forwarded to the TCEQ Enforcement Division for review and no further action by the DFW Regional office is warranted at this time.

**No Violations Associated to this Investigation**

Signed

*Diana Hethcote*  
Environmental Investigator

Date

*10/17/07*

Signed

*Quinn A. Zetel*  
Supervisor

Date

*10/17/07*

**Attachments: (in order of final report submittal)**

N/A Enforcement Action Request (EAR)

N/A Letter to Facility (specify type) : N/A

Investigation Report

N/A Sample Analysis Results

N/A Manifests

N/A NOR

N/A Maps, Plans, Sketches

N/A Photographs

N/A Correspondence from the facility

✓ Other (specify) :

State Superfund Status Sheet

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# TCEQ

Investigation No. 566299  
Fiscal Year 2007  
DFW Regional Office

## ATTACHMENT 1

State Superfund Candidate Site Eligibility/Status Sheet

**RN100700939**

**CN600255392**

**High Tech Plating  
Dallas County**

INVESTIGATOR: DEANA HETHERINGTON  
INVESTIGATION DATE: 06/14/07

VER/H - verified/historical E/NE - eligible/non-eligible EO/IR - emergency order/immediate removal  
TBR/REF - to be referred/referred SSC - site screening complete NS/NFA - non-site/no further action  
HR-I/C/R - HRS in progress/complete/revised ESC - enforcement screening comm. SN/A - sampling needed/active facility  
FO/RIFS/EPA/AG - Field Ops/Remedial Investigation Feasibility Study/Environmental Protection Agency/Attorney General

date/reviewed by date updated/by date entered/by

## STATE SUPERFUND CANDIDATE SITE ELIGIBILITY / STATUS SHEET

SITE NAME (and a.k.a.'s) High-Tech Plating

EPA # TXD174127407 TCEQ SWR # 39292 Other # \_\_\_\_\_

Location 2017 Peachtree Road

CITY Balch Springs COUNTY Dallas County

TYPE OF OPERATION Electro-plated computer parts with Zinc and Chrome

DATES OF OPERATION From July 1986 to February 1990

TNRCC REGION 4 REFERRAL SOURCE/DATE: EPA H ESC AG EPA

SSDAT ACTION: VER June 21, 2005 EO \_\_\_\_\_ HR-I \_\_\_\_\_ REF \_\_\_\_\_

TAKEN/DATE: SSC \_\_\_\_\_ IR \_\_\_\_\_ HR-C \_\_\_\_\_ HR-R \_\_\_\_\_

Groundwater Contamination Yes/No No If yes, explain in Comments

CURRENT STATUS: SN A FO RIFS EPA TBR \_\_\_\_\_ other NE

File reviewed by Xiaohong Wang Based upon Files available in Region 4 and EPA information, the site is currently a/an:

- ☐ Active facility - not eligible for Superfund refer to Field Operations. **A/FO**
- ☐ Eligible inactive facility - prioritize for HRS Package preparation. **EL**
- ☒ Inactive facility- currently under TNRCC enforcement. **NE/TBR FO; NE/TBR ESC**
- ☐ Inactive facility with insufficient data for evaluation purposes - referred to Field Operations Division for sampling inspection. **FO/SN**
- ☐ Inactive facility - no enforcement action/referral to Field Operations. **NE/FO**
- ☐ Non-site based on EPA/TNRCC investigation conducted on \_\_\_\_\_. **NS**
- ☐ Eligible inactive facility -prioritize for immediate removal determination and HRS package preparation. **EL**
- ☐ No further action under state superfund based on EPA/TNRCC investigation conducted on \_\_\_\_\_. **NFA**

Contaminants of Concern: Chromium, Zinc, Cyanide

COMMENTS: (Include contaminants of concern, analytical results, waste quantity and pathway information).

Based on the Executive Director's Preliminary Report to the Commission, the Metal Plating Systems facility (MPS), formerly named as High Tech Plating, originally located at 2017 Peachtree, Balch Springs, Texas from July 1986 to approximately February, 1990. The facility moved to Forney Industrial Park, Building 24, Forney, Texas in February 1990 and moved to 400 Industrial Blvd., Terrell, Texas after September, 1992. The facility stopped operation approximately March, 1994.

Based on the Draft After Action Report dated July 1, 1990, the site property is owned by Mr. Edwin Brown of Troup, Texas. The property was leased to Mr. Reggie Gist who operated an electroplating facility under the business name, Hi-

Tech Plating, until early February of 1990. The Texas Water Commission and RCRA Branch of the EPA had investigated the business for RCRA violations. The local water and sewer district attempted to prevent the operator of the plating facility from discharging the site wastes into the sewer system. When all reasonable attempts failed, the City of Balch Springs water district officials removed the sewer connection from the building to the city main line and disconnected the water supply. After these actions, the site was abandoned by the operator. There are fifty four vats and 30 drums containing acidic, caustic, and cyanide wastes on site. The fifty four vats located in the site building contained approximately 72,000 gallons of liquid wastes.

On February 28, 1990, the EPA Emergency Response Branch(ERB) was notified by an anonymous citizen of the potential threat of corrosive materials leaking from the abandoned electroplating facility. On 1 March 1990, a site assessment was conducted to identify the vat wastes and evaluate the potential for an immediate removal action at the site. Technical Assistance Team(TAT) measured the approximate volume and the PH of the wastes in each vat, and conducted air monitoring inside the building. Some of the vats were leaking despite previous efforts by the fire department to control the leaks, and thirty partially full drums labeled as containing hydrochloric acid and aluminum etch were located outside the building.

Mr. Edwin Brown, property owner, was contacted by the Environmental Services Division of the EPA on 2 March 1990 after the completion of the initial site assessment. Mr. Brown agreed to conduct stabilization actions. On 3 March 1990, Mr. Brown conducted initial stabilization actions at the site which included the covering of the vats containing cyanide waste to lessen the emission of cyanide gas, repairing and securing all leaking vats, moving all drums located outside the building into the interior of the building, and constructing temporary dikes to contain any possible leaks from the building. The actions were conducted by a contractor hired by Mr. Brown. The contractors also repaired a leak from one of the vats that occurred two days later. Mr. Brown solicited several bids from contractors to perform the complete site removal/clean-up. On 21 March 1990, Mr. Brown informed the EPA Office of the Regional Counsel that he would be unable to afford the cost of a complete site clean-up.

The other identified Potential Responsible Parties, Mr. Reggie Gist, site operator, has not been located, and Mr. George Seale has filed for bankruptcy.

After the initial stabilization actions were taken by the PRP, EPA contractor constructed a sand berm around the downlope portion of the site to prevent any further leaks from migrating offsite on April 3, 1990. On May 29, 1990, the wastes from the leaking and deteriorating vats were consolidated with compatible wastes in centralized vats that were in better condition based on different categories. After the deteriorating vats were emptied of all liquids by pumping the contents into centralized vats, the emptied vats were triple rinsed, cleaned, dismantled, and transported to a scrap metal disposal facility.

During the removal action, ambient and personnel air monitoring for hydrogen cyanide (HCN) was conducted with the MIRAN Infrared Analyzer and Monitox Detectors to evaluate the potential threat to the personnel and nearby residents of the potential vapors evolving during the removal action.

The waste material was transferred with a pump from the vats into a disposal vacuum truck for transport to the disposal facility. Approximately 11,788 gallons of caustic and cyanide wastes; 16,950 gallons of acidic wastes; 11,424 gallons of neutral and wastewater wastes; and 5,479 gallons of caustic sludge were transported to the EMPAK disposal facility for treatment and deep well injection. Approximately 220 gallons of organic and flammable liquids were packaged in 55 gallon drums and transported to the disposal facility for incineration.

The remaining empty and cleaned containers were cut into smaller pieces or crushed with a backhoe. The cut and crushed containers, the contaminated sand berm, and contaminated solid material was transferred into a disposal truck for transport to the Chemical Waste Management facility for landfilling at a permitted Treatment, Disposal, and Storage facility. At the conclusion of the removal project, the floors of the warehouse and the parking lot were rinsed completely. On 14 June 1990, the removal abatement actions were completed.

On April 18, 1990, TWC District 4 Office referred the High Tech Plating, Bacon Springs Facility to the Enforcement section in the TWC Central Office for appropriate enforcement action concerning the alleged violation 31 TAC 335.4 General Prohibitions. Enforcement issued an Order on September 6, 1995 requiring certain action of Rodney Gist and High TECH Plating under the Authority of Texas Health and Safety Code Ann. Chapter 361, and the Texas water Code, Chapter 5 and 26. The current order tracking coordinator in Enforcement Division of Central Office is Ms. Vanessa Davis (512-239-1993). Based on the phone call to Mr. Thomas Greimel who is also the coordinator of the site on June 21, 2005, the case is still in Enforcement Division.

Based on the information available, High-Tech Plating site is not eligible to State Superfund Program. No further action is recommended from Site Investigation and Community Relations (SICR) Section for the site until enforcement actions to complete closure of the site have been exhausted.